

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT GREENEVILLE**

UNITED STATES OF AMERICA

v.

**KEVIN LEE ROSEMEYER,
aka SAN QUINTON**

)
)
) **Case No. 2:19-CR-76**
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)

**MOTION FOR EXTENSION OF TIME TO FILE A RESPONSE
TO PRE-SENTENCE INVESTIGATION REPORT (PSR)**

Comes Nikki Himebaugh, Counsel for Defendant Kevin Lee Rosemeyer (hereinafter “Rosemeyer”), and moves this Honorable Court for an extension of time to file a response to the Pre-Sentence Investigation Report (PSR), and in support thereof would state as follows:

1. The sentencing in this matter is set for November 27th, 2020.
2. The PSR was received on November 5th, 2020 and Rosemeyer has an extensive criminal history in three states: California, Florida, and Tennessee. Rosemeyer is currently housed in Southwest Regional Jail in Abingdon, VA. Undersigned Counsel has been preparing for jury trial in mid-November and Counsel has not yet had the opportunity to meet with Rosemeyer to discuss possible objections; and as such, additional time is needed for consultation with Rosemeyer.
3. Counsel would aver that a brief extension in the above matter would ensure ample time for the full attention and due diligence to which each criminal Defendant is entitled.
4. The undersigned would request an eight-day continuance to **November 27th, 2020**.
5. Counsel has discussed this with Andrew Parker, Assistant United States Attorney, and he has no objection to an extension. Undersigned counsel respectfully requests this Honorable Court extend the plea deadline, motions deadline, and trial date in this case.
6. This request is not made for the purposes of delay and the granting of a continuance of the sentencing hearing should prejudice no party.

WHEREFORE, the defendant, by and through counsel, respectfully moves this court for an extension of time to file objections to the PSR to November 27th, 2020.

Respectfully Submitted,

s/H. Nikki Himebaugh
H. Nikki Himebaugh,
Counsel for Defendant
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CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of November 2020, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

Respectfully Submitted,
s/H. Nikki Himebaugh
Counsel for Defendant